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May 23, 2022

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

**Application Granted.** Defendant's conditions of release are hereby modified to remove the condition of curfew and to authorize travel to the Districts of Massachusetts and Rhode Island. All other conditions of release shall remain in effect. The Clerk of the Court is directed to terminate the letter motion at docket number 29.

**Dated: May 25, 2022**  
New York, New York

**Re: *United States v. Norman Gray, 21 CR 713 (LGS)***



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I represent Norman Gray in the above-captioned case. With the consent of the government and Pretrial Services, I write to request a modification of certain conditions of Mr. Gray's pretrial release.

The original conditions of Mr. Gray's pretrial release included: (1) a \$250,000 personal recognizance bond co-signed by two financially responsible persons and secured by Mr. Gray's residence and \$50,000 in cash; (2) supervision by Pretrial Services; (3) home detention with location monitoring as directed by Pretrial Services; (4) passport surrender with no new applications for international travel documents; (5) travel restricted to the Southern and Eastern Districts of New York and the District of Connecticut; (6) no contact with victims, witnesses, or alleged co-conspirators; (7) no opening of any new bank accounts, credit cards, or lines of credit without the approval of Pretrial Services; (8) no solicitation of money from non-family members; and (9) no participation in any capital raises by his biotech company. On December 22, 2021, the Court modified Mr. Gray's pretrial release conditions to remove home detention and place him on a curfew with GPS monitoring.

Mr. Gray has been fully compliant with all conditions since he was released on bail. Due to the nature of Mr. Gray's work schedule, laboratory work, and frequent travel requirements to certain neighboring districts for employment purposes, I respectfully request that his conditions of release be modified to remove the curfew and to add the District of Massachusetts and District

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of Rhode Island to his authorized districts of travel. All other conditions would remain the same, and any travel would be approved by his supervising officer. The parties agree that such a modification would allow Mr. Gray to meet his work responsibilities while still remaining within the supervision of Pretrial Services.

Thank you very much for your consideration of this request.

Respectfully submitted,

/s/ Megan Wall-Wolff  
Megan Wall-Wolff

*Attorney for Norman Gray*

CC: AUSA Ben Gianforte  
AUSA Tara LaMorte